

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Steve Fanady)
Plaintiff) No. 22 cv 4180
and) Judge: Andrea Wood
Thomas Dart, as Sheriff of Cook County)
Illinois, and Amanda Gallegos as Executive)
Director of the Cook County Jail) Magistrate: Cummings
Defendant)

**MOTION FOR LEAVE TO FILE A
PETITION FOR A WRIT OF HABEAS CORPUS**

NOW COMES the Plaintiff, Steve Fanady, by and through his attorney, Laura Grochocki, and moves this Court to grant him leave to file a Writ of Habeas Corpus in the above-entitled case. In support of this petition, Plaintiff states as follows:

1. Plaintiff Steve Fanady (“Fanady”) has a Complaint pending in the above-entitled case which alleges that he is intentionally and negligently being subject to unconstitutionally deficient conditions in the Cook County Jail, where he is being held after a finding that he is in indirect civil contempt of court.
2. Fanady has a claim against the Sheriff of Cook County for a Writ of Habeas Corpus under 28 USC §2254. A copy of Fanady’s proposed Habeas Corpus complaint is attached hereto as Exhibit “A”.
3. As Fanady and the Sheriff are both parties to this case, and because the current claims on file and the Habeas Corpus claim both concern Fanady’s incarceration, it is most efficient if the Habeas Corpus claim be brought in the above-entitled case.

WHEREFORE, Plaintiff Steve Fanady prays that this Honorable Court grant him leave to file his Petition for Habeas Corpus in the above-entitled case, instanter, and for such other relief that the Court deems fit.

Respectfully Submitted

/s/ Laura Grochocki

Attorney for Steve Fanady

Laura Grochocki
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CERTIFICATE OF SERVICE

The undersigned attorney certifies that I caused to be served the above and foregoing Motion for Leave to File Complaint For A Writ of Habeas Corpus via the U.S. District Court's Electronic Filing System to all parties of record on the 22nd day of February, 2023 before 12:00 p.m.

/s/ Laura Grochocki

Attorney for Steve Fanady

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